

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

NO. 16-CR-20732

HON. ROBERT H. CLELAND

vs.

D-5 QUINTIN RAMANAUSKAS,

Defendant.

/

**MOTION AND ORDER TO UNSEAL PORTIONS OF PLEA HEARING
FOR LIMITED PURPOSE STATED HEREIN**

THE UNITED STATES OF AMERICA respectfully submits the following:

1. On July 2, 2019, a Detroit grand jury charged Jay A. Schwartz with several public corruption offenses. The indictment alleged that Mr. Schwartz conspired with Defendant Quintin Ramanauskas and others to bribe Defendant Dean Reynolds, a then-Clinton Township Trustee, with free legal services and cash. Mr. Schwartz's case was ultimately assigned to Judge Robert H. Cleland under case number 3:19-CR-20451. In Mr. Schwartz's case, the Government is represented by AUSAs from the Northern District of Ohio who have been designated as special attorneys representing the Attorney General in the Eastern District of Michigan.

2. Mr. Schwartz's case is scheduled for trial beginning November 12, 2021.

3. Ramanauskas will be a Government witness at Mr. Schwartz's trial. The Government is thus obligated to provide the defense with impeachment material and prior statements under *Giglio v. United States*, 405 U.S. 150 (1972), and the Jencks Act, 18 U.S.C. § 3500, respectively.

4. At a change of plea hearing for Ramanauskas on July 27, 2017, the Court sealed portions of the hearing.

5. The Government requests that the sealed portion of Ramanauskas's plea hearing be unsealed for the limited purpose of allowing the Government to provide a copy of the transcript to Mr. Schwartz's counsel for their use at trial. The documents will remain under seal in all other respects.

6. Counsel for defendant Ramanauskas has agreed to the relief

sought herein. In addition, counsel for defendant Schwartz has also agreed to the relief sought.

Respectfully submitted,

SAIMA S. MOHSIN
Acting United States Attorney

s/*David A. Gardey*
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Dated: October 8, 2021

IT IS SO ORDERED.

s/*Robert H. Cleland*
HON. ROBERT H. CLELAND
United States District Judge

Entered: October 8, 2021